

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| IN RE: | : | |
| | : | 25-md-3143 (SHS) (OTW) |
| OPENAI, INC., COPYRIGHT | : | |
| INFRINGEMENT LITIGATION | : | Hon. Sidney H. Stein |
| ----- | X | Hon. Ona T. Wang |
| | : | |
| THIS DOCUMENTS RELATES TO: | : | |
| | : | |
| All Actions. | : | |
| ----- | X | |

AFFIDAVIT OF BRIAN M. KRAMER IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE*

I, Brian M. Kramer, declare as follows:

1. I am an attorney at law licensed to practice in the State of California. I submit this Affidavit in support of my motion for admission *pro hac vice* before the United States District Court for the Southern District of New York to represent Defendants OpenAI Inc.; OpenAI LLC; OpenAI LP; OAI Corporation LLC; OpenAI GP LLC; OpenAI Global LLC; OpenAI Holdings LLC; OpenAI OpCo LLC; OpenAI Startup Fund GP I LLC; OpenAI Startup Fund I LP; OpenAI Startup Fund Management LLC ("OpenAI").

2. I am a member in good standing of the Bar of the State of California, and a true and correct copy of my certificate of good standing issued by the Supreme Court of the State of California is attached.

3. Pursuant to Local Rule 1.3(c), I state: I have never been convicted of a felony; I have never been censured, suspended, disbarred or denied admission or readmission by any court; there are no disciplinary proceedings presently against me; and I have read and am familiar with the provisions of the Judicial Code (Title 28 U.S.C.), the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, the Federal Rules of Evidence, the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and the New York Rules of Professional Conduct.

4. I will faithfully adhere to all rules applicable to conduct in connection with any activities in this Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 6, 2025

By: Brian M Kramer
Brian M. Kramer
BMKramer@mofo.com

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

Subscribed and sworn to (or affirmed) before me on this 6th day of May, 2025, by Brian M. Kramer, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature: _____

My Commission Expires: June 5, 2026

(Seal)

